

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

**Civil Action No.: 2:19-CV-37**

**BILLY JOE BREWSTER, JR.,  
LARRY E. NORMAN, and  
THOMAS L. HILL, on behalf of  
themselves and others similarly  
situated,  
Plaintiffs,**

**AFFIDAVIT OF FRANK HILL**

**v.**

**PHILLIP E. BERGER, in his  
official capacity as Speaker Pro  
Tempore of the North Carolina  
Senate; TIMOTHY K. MOORE,  
in his official capacity as Speaker  
of the North Carolina House of  
Representatives, DAMON  
CIRCOSTA, STELLA  
ANDERSON, JEFF CARMON  
III, DAVID C. BLACK, KEN  
RAYMOND AND KAREN  
BRINSON BELL, in their official  
capacities as officers or members  
of the North Carolina State Board  
of Elections,  
Defendants.**

**AFFIDAVIT OF FRANK HILL**

The Affiant being duly sworn says the following

1. My name is Frank Hill;
2. I am a citizen and resident of North Carolina and am over 18 years of age and am sui juris.
3. I was the 1984 Republican nominee in the 1982 NC 2<sup>nd</sup> Congressional District race;
4. From 1985 to 1995 I was the Chief of Staff for Congressman Alex McMillan of the

NC 9<sup>th</sup> Congressional District.

5. In 2002 I served as a campaign advisor for Elizabeth Dole in her US Senate campaign and then from 2002-2004 I served as Senator Elizabeth Dole's first Chief of Staff.

6. Since 2010 I have run the non profit, The Institute for the Public Trust ("the Institute". This organization's sole purpose is to seek, find, recruit and the train intelligent, talented and honorable people to run for elected office. Our recruitment emphasizes people who have made their mark outside of political parties to be the candidate voters can choose. This recruitment is done on a non-partisan basis with recruitment based on intellect, character and temperament - not political philosophy.

7. Once the Institute recruits well qualified people to enter the program the people are asked to attend seven evening sessions of training. Each session is three hours and consists of experts we bring in from Washington DC and from across the state. These experts discuss the practical aspects of campaign management, polling, the use of various media, constitutional law and the philosophical historical underpinnings of the American democratic republic. It is a strong time commitment for the attendees.

7. In my role as the director of The Institute for the Public Trust I have observed the effect continual Congressional redistricting has on our recruitment of classes. It is understood that redistricting every census is a constitutionally mandated event and this is just a fact of political life. However, the unrelenting legal challenges and subsequent upending of Congressional districts is a tremendous disruptive factor discouraging our recruits from wanting to run for Congress.

8. A frequent question asked of me by our potential candidates is "How can I go to people, both voters and donors, and ask them to support me in a run for Congress if I can't tell

them with any certainty if I will be in their voting district for any appreciable length of time?" In recent years I have had to tell them I cannot give them a satisfactory answer - in North Carolina neither a candidate nor a voter can depend on a district lasting for ten years much less for two years. In my experience, this lack of confidence in the stability of Congressional districts is the single most important factor discouraging good people from running for Congress.

9. The lack of stability caused by constant Congressional redistricting also adversely effects the voters in Congressional districts.

10 I base my conclusion in Paragraph 9 in large part on my experience as Congressional McMillan's Chief of Staff from 1985 to 1995. During my tenure as Chief of Staff, Congressman McMillan only dealt with the Constitutionally mandated redistricting of 1990. Because of this stability I experienced first hand the voters of Congressman McMillan's district knew McMillan's beliefs, his voting record, his constituent services, and his general character. Because of the voters' ability to assess McMillan over time the voters were able to decide whether or not to vote for him based on his record. I was told by more than one voter in McMillan's district they knew McMillan and knew where he stood and this was a crucial factor in voting behavior.

AFFIFIANT FURTHER SAYS NOT

This is the 3<sup>rd</sup> day of November, 2019

  
Frank Hill

NORTH CAROLINA

DURHAM COUNTY

FRANK HILL, being first duly sworn, deposes and says:

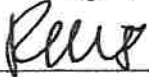
That he is the Affiant in the foregoing Affidavit; that he has read same and that it is true of his knowledge, except as to those matters and things therein stated upon information and belief, and as to such he verily believes it to be true.



Frank Hill

Sworn to and subscribed before me

this the 04 day of November, 2019



Notary Public

My commission expires: 03/28/2023

